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March 18, 2022

The Honorable Debra Freeman  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *Lovati v. Bolivarian Republic of Venezuela*, Case No. 1:19-cv-04793-  
ALC-DCF [related to Case No. 1:19-cv-04796-ALC-DCF]

Dear Magistrate Judge Freeman:

I write on behalf of Defendant, the Bolivarian Republic of Venezuela, and Plaintiffs Rudi Giovanni Lovati and Alessandro Lucibello Piani in followup to the parties' joint letter of February 1, 2022, regarding the progress of discovery. ECF No. 69.

As referenced in the parties' letter of February 1, Defendant served written deposition questions for Plaintiffs Rudi Giovanni Lovati and Alessandro Lucibello Piani on December 27, 2021. Plaintiffs provided objections and certified responses to those questions on March 8, 2022, and the parties met and conferred on March 16. After reviewing Plaintiffs' responses, Defendant had an additional question for Plaintiff Lovati, and Plaintiffs' counsel agreed to endeavor to provide a response by Friday, March 25. The parties then intend to file an additional status report regarding next steps in this case.

The parties do not anticipate that any disputes will arise with regard to this supplemental response and the following joint status report. If a dispute does arise that the parties are unable to resolve after conferring in good faith, we will promptly seek the Court's assistance.

We thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kent A. Yalowitz".

Kent A. Yalowitz

cc: ECF Counsel